

**REMARKS**

Claims 1 and 3-9 are pending in this application. By this Amendment, claims 1 and 3-8 are amended. Claim 9 is new. Claim 2 is canceled. Support for the amendments to claims 1 and 8 may be found at least at originally filed claim 2 and at least at Figure 4c and page 17, lines 12-17 of the specification. No new matter is added. In view of at least the following, reconsideration and allowance are respectfully requested.

**I. Personal Interview**

Applicants appreciate the courtesies shown to Applicants' representatives by Examiner Fujita in the January 7, 2009 personal interview. Applicants' separate record of the substance of the interview is incorporated into the following remarks.

**II. Claim Rejections under 35 U.S.C. §103**

The Office Action rejects claims 1 and 6-8 under 35 U.S.C. §103(a) over U.S. Patent Publication No. 2001/0053246 (Tachibana) in view of U.S. Patent No. 6,931,151 (Weast) and in view of U.S. Patent No. 6,128,407 (Inoue); rejects claim 2 under 35 U.S.C. §103(a) over Tachibana in view of Weast in view of Inoue and further in view of "Color-Defective Vision" (Meyer); rejects claim 5 under 35 U.S.C. §103(a) over Tachibana in view of Weast in view of Inoue and further in view of "Constructing a Uniform Color Space" (Takamura); and rejects claims 3 and 4 under 35 U.S.C. §103(a) over Tachibana in view of Weast in view of Inoue in view of Meyer and further in view of "Uniform-Scale Chromaticity" (Oleari). These rejections are respectfully traversed.

As discussed during the January 7, 2009 personal interview, Applicants respectfully submit that the applied references alone, or in any combination, do not teach calculating an angle between a line, in a given color component space, connecting a given point, which is defined in connection with color blindness of a human being, and one of the colors of the determined color group; and a line in the given color of the determined color group, and

determines as to whether or not each calculated angle is less than the given threshold value, the retrieval unit determines said one of the colors and said other of the colors, which corresponds to the one calculated angle, as a confusion color set. Thus, the applied references fail to disclose or render obvious the features of independent claims 1 and 8. Further, Applicants respectfully submit that Meyer as well as the other cited references fail to describe calculating the angle alpha as shown in Figure 4(c).

With respect to independent claims 3 and 4, Applicants respectfully submit that the applied references alone, or in any combination, fail to disclose or render obvious a retrieval unit that defines a nearby confusion area for each of the colors contained in the determined color group. Further, Tachibana fails to teach that the conversion controller defines a nearby confusion area for each target color to be converted and fails to disclose that when one attention confusion color locus included in the confusion color locus group passes through insides of some of the nearby confusion areas, the retrieval unit determines colors contained in the some of the nearby confusion area as the confusion color set.

Further, with respect to independent claim 5, Applicants respectfully submit that the applied references alone, or in any combination, fail to disclose or render obvious a retrieval unit that determines which block each of the colors contained in the determined color group belongs to. Additionally, to construct a color space is clearly different from "to determine some of the colors contained in the determined color group as confusion color set based on block confusion color information".

Accordingly, withdrawal of the rejection is respectfully requested.

### **III. New Claims**

Claim 9 depends from claim 1. Because the applied references fail to anticipate or render obvious the features recited in independent claim 1, dependent claim 9 is patentable

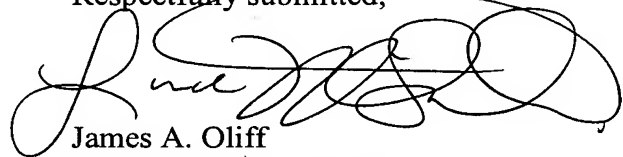
for at least the reasons that claim 1 is patentable, as well as for the additional features it recites. Accordingly, entry of the claim is respectfully requested.

**IV. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1 and 3-9 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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JAO:SZS/amt

Attachment:  
Petition for Extension of Time

Date: January 12, 2009

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